

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 7** 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115

### SEP | 6 1987

### **MEMORANDUM**

SUBJECT: Transmittal of Inspection Report - RCRA

FROM:

Robert B. Dona RD Dona

Chief, RCRA Monitoring Section, EMCM/ENSV

T0:

Michael J. Sanderson

Chief, RCRA Section, WSTM

This memorandum transmits the following RCRA compliance evaluation inspection report performed by the RCRA Monitoring Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

EPA I.D. Number

Activity No. Areas of Non-Compliance

Union Electric Ashley MOD000805499

ALF 22

None observed

Facility St. Louis, Missouri

Attachment

RECEIVED

SEP 1 7 1987

USEPA, RCRA Branch



REPORT OF RCRA COMPLIANCE INSPECTION

AΤ

UNION ELECTRIC CO. / ASHLEY FACILITY

ST. LOUIS, MISSOURI

EPA I.D. NUMBER: MOD000805499

ON

JULY 21-22, 1987

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

#### INTRODUCTION

At the request of the Waste Management Division (WSTM), a compliance evaluation inspection (CEI) was performed at Union Electric Company's Ashley Facility in St. Louis, Missouri on July 21-22, 1987. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This report and its attachments present the results of the inspection.

#### **PARTICIPANTS**

Union Electric Ashley Facility (UEA):
Don Crawford, Plant Manager
Paul Pike, Environmental Specialist

U.S. Environmental Protection Agency (EPA) : Kathryn Lawrence, Environmental Engineer

#### INSPECTION PROCEDURES

Upon arrival at the facility, I met with Paul Pike who introduced me to the plant manager, Don Crawford. Mr. Crawford escorted us to his office. At that time, I presented my EPA credentials and explained the purpose of the inspection and the procedures that I would follow. The inspection consisted of a discussion of UEA's hazardous waste management activities, a record review, and a visual inspection. At the end of the visual inspection, I conducted an out-briefing. I discussed my findings and observations with the representatives and Mr. Crawford signed a

document receipt and Confidential Business Information (CBI) form which claimed that none of the information gathered during the CBI needed to be handled as CBI. These documents are provided in attachments 1 and 2, respectively. No NOV was issued at the end of this inspection.

#### FACILITY DESCRIPTION

The Union Electric Ashley Facility is located at 4 Ashley Rd. in St. Louis, Mo. The facility is a power plant which generates electricity for the St. Louis metropolitan area. The plant uses number six fuel oil to feed the plant boilers which in turn generate turbine steam for the generation of electricity. UEA submitted a notification of Hazardous waste activity on 1/31/87 which listed the facility as a burner of hazardous waste fuel and off-specification oil. This notification also provided that UEA would burn these fuels in a Utility Boiler. The facility also received a resource recovery permit from MDNR on September 24, 1986. The Permit does not specify burn parameters.

### FINDINGS AND OBSERVATIONS

UEA only accepts and burns off-specification fuel oil from other Union Electric divisions. Hazardous waste fuel was not being accepted or burned at the time of this inspection. With the exception of one of the Union Electric divisions, the Union Electric Dorsett facility, all are reportedly conditionally exempt small quantity generators. The Dorsett facility falls into small quantity generator status four times annually when it generates and ships quantities of Safety Kleen solvents. However, all waste fuels received by UEA are defined as off-specification used oil.

#### A. Waste Streams

1. Off-specification Used Oil UEA receives approximately 10,000 gallons of used oil per month from other Union Electric divisions. According to facility representatives, the waste oil that UEA receives is only non-PCB oil. It is received on a bi-weekly basis and is mixed with number six fuel oil in a 250,000 gallon tank before being burned in the facility boilers. UEA performs analyses on all received oil, which is transported in a four compartment Three samples are taken at varied depths in each compartment, composited, and analyzed. A number of these analyses are provided in attachment 3. It should be noted here that the majority of the analyses provide that the halogen content of the oils received is above 1000 ppm. Pursuant to 40 CFR 266.40(c), used oils containing greater than 1000 ppm halogens are assumed to have been mixed with hazardous wastes unless the facility can prove otherwise. UEA representatives provided that the high halogen content was due to the detergents that are present in many of the oils before use. Although this appears to be a viable explanation, another possibility may be the introduction of PCB contaminated oils into the used oil transported to UEA. Since UEA does

not perform PCB analyses on the used oil, sufficient information was not available to make an accurate determination of the used oil's PCB content. However, the possibility of PCB contamination may warrant further investigation.

The used oils generated by UEA are also mixed with clean fuel oil in the #6 fuel oil tank to be burned in the facility boilers. The burn rate for the mixed oil is reportedly 125,000 gallons per week.

2. Waste Solvent
The only solvent used in UEA maintenance activities is mineral spirit
based Navitone. It solvent is used in two parts washers in the
maintenance shop and is also used to clean burning guns. According to
the attachment 4 material safety data sheet, Navitone has a boiling
point of 212F and a flash point above 212F. It is not a hazardous waste
when spent. Approximately 300 gallons of waste navitone are generated
per annum and are mixed with used oil for burning in the facility
boilers.

#### B. Records

- 1. Inspection Record UEA personnel inspect the number 6 fuel tank on a weekly basis. An example of the facility's logsheet is provided in attachment 5.
- 2. Manifests
  Manifests are reportedly used for all shipments of waste oil. A number of examples are provided in attachment 6.
- 3. Analyses
  As discussed above, UEA performs analyses on each batch of used oil that is received. A number of analyses are provided in attachment 3.
- 4. Notifications
  UEA has not received marketer notification form the Union Electric divisions that ship off-specification oil to the facility. In addition, UEA has not provided off-specification used oil burner notification to those division. Facility representatives stated that they did not believe the notification to be necessary since both burner and marketer were essentially part of the same company.

### C. Visual Inspection

- 1. Fuel Tank (Photographs 1-2)
  Photographs 1-2 depict UEA's #6 fuel tank. Oil stains were observed on
  the surrounding soils. However, the stains appeared to be due to de
  minimus losses from line drippings. No problems were observed in this
  area.
- 2. Maintenance Shop
  The maintenance shop was inspected during this RCRA CEI. The only RCRA regulated wastes generated at this location were small quantities of

lubricating oils. These oils are collected and mixed with other oils in the #6 fuel tank. The two parts washers described above are located in the shop. However, they do not generate any hazardous wastes. No problems were observed in this area.

- 3. Plant Floor (Photograph 3)
  During the inspection of the plant floor, I observed 7 drums of used oil and 1 drum of Navitone in a maintenance station in the plant basement. Facility representatives stated that the drums were being stored at that location until they could be pumped into the #6 fuel tank. No problems were observed in this area.
- 4. Thermal Resources (Photographs 4-6)
  Thermal Resources (TR) has purchased the UEA facility and contracted Union Electric employees to operate the power plant. However, another portion of the facility is both owned and operated soley by Thermal Resources. The TR operated area is in a building separate from and adjacent to the power plant. The building houses TR employee offices and a small maintenance shop. Maintenance shop activities result in the generation of approximately 20 gallons per year of a spent mineral acid-based cleaning solution called Wedac. The Wedac material safety data sheet (MSDS) is provided as attachment 7. Although the safety data sheet does not provide sufficient information to make a determination of the waste's regulation, the spent material may be corrosive. The MSDS does provide that Wedac is metal reactive. TR has not analyzed the Wedac waste.

At the time of this inspection, I observed several containers of spent Wedac in a storage building near the maintenance shop. Photographs 4-6 depict the area in which the containers were stored and it appeared that the combined capacity of the containers was approximately 65 gallons. At the time of this inspection (contingent upon the spent Wedac being RCRA regulated), the facility would have been considered a regulated SQG, since the quantity of waste stored exceeded 100 kg. (Missouri Regulations). However as of August 1, 1987, the TR facility appears to be a conditionally exempt SQG since the waste generation rate is less than 100 kg/mo. and the quantity of waste stored does not exceed 1000 kg. It should be noted here that a complete RCRA CEI was not conducted at this location due to its independence from the facility for which the inspection request was made. However, TR representatives stated that the Wedac would be analyzed and, if necessary, disposed as a hazardous waste.

### CONCLUSIONS AND RECOMMENDATIONS

D. Conclusions
The Union Electric Ashley facility is a RCRA regulated burner of offspecification used oils. The facility does not appear to generate any
hazardous wastes other than used oil. At the time of this inspection,
it appeared that UEA was in compliance with the RCRA regulations and
Missouri environmental laws.

E. Recommendations

As discussed in report section A1, it appears that the possibility of PCB contamination of the UEA used oils may warrant further investigation.

Lawrence

Date 19/8/87 Activity Number: ALFZ7

Date: 9-14-87

#### **ATTACHMENTS**

- 1. Document Receipt
- 2. CBI Form
- 3. Analyses
- 4. Tank Inspection Log Sheet
- 5. Manifests
- 6. Navitone Material Safety Data Sheet7. Wedac Material Safety Data Sheet
- 8. Photographs

# .s. ENVIRONMENTAL PROTECTION A CY

### RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address	Firm Name and Address UNION ELECTRIC + ASHLEY ST. LOUIS, Ma
	ST. LOUIS, Ma
U.S. EPA, Region VII	Name of Individual
ENSV Division 25 Funston Road	DON CRAWFORD
Kansas City, Kansas 66115	TITLEPLANT MGR.
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( ) Purchased   Sample Numbers	( ) Received no charge ( )Borrowed
Tourist Turibers	Amount paid for Samples
Duplicate Samples Requested   Method	d of Payment
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Signature (Owner, Operator, or Agent	Title
Hon W Erawford	Flant Mgr.
Name of Inspector Title	Inspector's Sygnature

# RCRA INSPECTION ACCY CONFIDENTIALITY NOTICE

Name and Address of Inspector(s)  U.S. EPA, Region VII ENSV Division 25 Funston Road	Name and Address of Facility  UNION ELECTRIC  4 ASHUEY  DT. LOUIS MO  Owner, Operator, or Agent in Charge  DON CRAWFORD
Kansas City, Kansas 66115	Title PLANT MGR.  Address SAME
Name of Individual to Whom Notice Given  CRAWTORD	Title PLANT 1/2487

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FDIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets  $\underline{all}$  of the following criteria:

- 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
- 3. The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA	INSPECTION	CONFIDENTIALITY	NOTICE	Facility		
		•		UNION	BECTRIC	(ASILEY)

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner Director, Waste Management Division United States Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

### U.S. ENVIRONMENTAL PROTECTION AGENCY 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

### REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual  Dow CRAWFORD	PLANT MGR 7/22/87
<u> </u>	+UTN MAR /22/9.]
Firm Name	Firm Address 4 ASHIE
Union about	ST. LOUIS, MO

Information for which Confidential Treatment is requested:

### Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures: (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial of quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)  Low Low forf	Plant Manager
Name of Inspector Title HAVIROUMENTAL CHARLES ENGINEERS	Inspector's Signature  Pathy Laurence

ASDM JDM

## HAZARDOUS WASTE RECEIVED REPORT

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Date Inspected 2 - h - 87
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Accompanying Manifest Document Number 41376 3652 AL 1466
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Does the received waste material match the identity of the waste designated on the accompanying manifest?
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<u>.</u>
Signed J. Phiker

Job No. 1184 1/9/81

Please forward this form with accompanying manifest to the Engineering Office.

Premiped into Day Fank, 2/9/87, AM.

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FORM 4643 INSTRUCTIONS FOR THE COMPLETION C: THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI—DESTINED SHIPMENTS

### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102 314-751-3241

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC

1-800-424-9300

MISSOURI DNR FINAL COPY --- PART

### HAZARDOUS WASTE MANIFEST

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ASHLEY LANT ST.  ST LOUIS MO. 63102  11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)  12. Containers  Total Outer Total Outer Total Outer  MO. 7.  MO. 7.  MO. 7.  MO. 7.  MO. 7.  MO. 7.  Additional Descriptions for Materials Usled Above  B.  Additional Descriptions for Materials Usled Above  R. Handling Codes for Wasser Listed Above  B.  C.  d.  15. Special Handling Instructions and Additional Information IF SPILLED CONTAIN AND  CLEAN UP  16. GENERATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state regulations.  Signature  Month Day Year  Month Day Year  Month Day Year  Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  Signature  Month Day Year  Month Day Year  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Month Day Year  Month Day Year  Month Day Year  Printed/Typed Name  Signature  Month Day Year  Month Day Year	ASHLEY LANT ASHLEY	9. Designated	Facility Name and Site	Addrass	10 116 604 10 11	· · · · ·					•	
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FORM 4643 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM, ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

EPA Form 8700-22 (3-84) MDNR-HWG 10

### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102 314-751-3241

EMERGENCY RESPONSE U.S. COAST GUARD 1-600-424-6802 CHEM TREC 1-800-424-9300

PAAR --

DMR FINAL COPY

MISSOURI

### HAZARDOUS WASTE MANIFEST

(Form designed for use on elite (12-pitch) typewriter) Please print or type Form Approved OMB No 2000-0404 Expires 7 31 86 UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manifest 2.Page / Information in the shaded areas Document No. **WASTE MANIFEST** is not required by Federal law. 3. Generator's Name and Mailing
WENTE POWER
MAIN & MCKINLEY
VENICE, I'LL, A. Missouri Manifest Document Number 137610003 4. Generator's Phone (314) 621-322 5 Transporter 1 Company Name C. MO. Transporter's ID H102 M.O.D. 0.9.6.7.3.36.0 5 D. Transporter's Phone 62/-322 UNION 7. Transporter 2 Company Name E. MO. Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address
ASHLEY FOWER PLANT 10. US EPA ID Number G. State Escility's ID ST. LOUIS, MO. 12 Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Unit I. Waste No. Quantity M:∕vo MO. O. O. OIL - COMBUSTIBLE N.O.S. NA 1993 200 Other MO. Other C. MO Other MO. Other J. Additional Descriptions for Materials Listed Above K. Handling Godes for Wastes Listed Above a. . . . b. C. d. 15. Special Handling Instructions and Additional Information ILL. TRANSPORTOR # 1118004 ILL. FACILITY # 921890008 IF SPILLED, CONTAIN AND ATOR BY THE CLEANUP 16. GENERATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state regulations. Date Printed/Typed Name Signature Month: Day p 210.51 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year ames 10.210.518 18. Transporter 2 Acknowledgement or Receipt of Materials Date Printed/Typed Name Signature Month Day 19. Discrepancy Indication Space SCOPY Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year

INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET. , THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS

### MISSOURI DEPARTMENT OF NATURAL RESOURCES Division of Environmental Quality

Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3241

EMERGENCY RESPONSE
US CORAST GUARD
1-800-014-800
CHEW TREC
1-800-494-9300
DEPT OF NATURAL RESOURCES
214-834-7408

### **HAZARDOUS WASTE MANIFEST**

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THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

### JRI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3241

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-494-88(2) GHEM TREC 1-806-424-8900 DEPT OF MATURIAL RESOURCES 314-624-34-95

MISSOURI DNR FINAL COPY—PART 1

THIS COPY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED PAINT THEN TO AND ADMINISTRATION OF AND ADMINISTRAL OF 
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	have a program in place to reduce the volume and toxicity of waste generated to the de or disposal currently available to me which minimizes the present and future threat to	gree I have determined to be eco	onomically pr	racticable and	I have selected	the method of treatment, storage
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(One Sheet per Group of Analyses)

Composit	e Jample	Date 2-9-87
Sample Mo. or Heatification: Transfer	Requisition No.	7815
Description of Sample: Waste Oil From /	ENICE PLANT, 18.	& GRATIOTST., 500 E. BROAD
(Three samples from each tanker compart	tment) Pumped int Ashley Pla	o the Day Tank at the Mar.
Analysis Desired: Total Halogens, Flash Po-		
(Follow special waste oil analysis procedu		
analysis.), BTU/Lb.		
Remarks: (Include special conditions which Metals analyses to be sent out to Indústr		pe of test)
CEARCE ACCOUNT:	Bequested by:	P. R. Pike
Mv. Hajer Miror Lee. Budget V.O.	Department:	Environmental Services Dept.
61 512 80	Copies to:	J. D. Murphy - Ashley Plant F. X. Blood - Lab. Services I J. K. Carpenter - Lab. Services D G. E. Kerr - Lab. Services D C. A. Zale - Lab. Services D G. S. Kramer - Fossil Puel De
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FORM 4643 INSTRUCTIONS FOR THE COMPLETE NOT THIS FORM ARE ON A SEPARATE SHEET.

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Consider the manuage on residence

#### MISSOURI DEPARTMENT OF NATURAL RESOURCES

EMERGENCY RESPOR U.S. COAST GUARL 1-800-424-3302 CHEM TREC 1-800-424-9308

### **HAZARDOUS WASTE MANIFEST**

Form Approved OMS No 2000-0404 Expires 7-31-86 (Form designed for use on elite (12-pitch) typewriter.) Page print or type 1. Generator's US EPA ID No. Manifest 2. Page ... Information in the shaded areas UNIFORM HAZARDOUS Document No. is not required by Federal law. WASTE MANIFEST 3. Generator's Name and Mailing Address 4. Generator's Phone ( )/Y 6. US EPA ID Number 5. Transporter 1 Company Name D. Transporter & Higher 17スカンケイプライ・コイ U. .. Produce C. E MO THIM DOWN IN 8. US EPA ID Number 7. Transporter 2 Company Name 10. US EPA ID Number 9. Designated Facility Name and Site Address Des P Too lite 1212 / Para H 44 H. Facility Priority and the state of the 12.Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Quantity 40.1 41 . 5 đ. Additional Descriptions for Statemes Listed Above 15. Special Handling Instructions and Additional Information But that and a sole 15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state . . . . . . . . Date regulations. Month Day Year Signature , Printed/Typed Name 507 11.71 KG H. S. Bollow Date 17. Transporter 1 Acknowledgement of Receipt of Materials Month Day Year Signature Printed/Typed Name Vamis H. 15-717-2 18-6 Date 18. Transporter 2. Acknowledgement or Receipt of Materials Month Day Yos/ Printed/Typist Name Signature 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Month Day Year Signature Printed/Typed Name J. OVIES.

ORM 4643 ISTRUCTIONS FOR THE OMPLETION OF THIS FORM RE ON A SEPARATE SHEET.

HIS DOCUMENT MUST BE SED FOR ALL MISSOURI— ESTINED SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102 314-751-3241



EMERGENCY RESPONS U.S COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300

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### **HAZARDOUS WASTE MANIFEST**

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Job No. 430 L. S. #86888

### REQUEST FOR ANALYSIS CENTRAL LABORATORY

M9577 10/13/86

(One Sheet per Group of Analyses)

		Date 7/18/86
Sample No. or Identification: TRANS	FER REQU	
Description of Sample: Waste Oil F		
PUMPED INTO DAY TANK		COLOR AT 20 AV
Analysis Desired: FLASHPOINT, 7		
CHROMIUM, LEAD		
Remarks: (Include special conditions w	hich may influence	type of test)
nemaras. (Include special conditions w	The state of the s	
CHARGE ACCOUNT:	Requested	by: PAUL PIKE
Div. Major Minor Loc. Budget W.O.		: ENVIRONMENTAL SERVICE
61 512 80	Copies to:	JAMES MURPHYL
61 218	÷ .	GERRY KERR
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Laboratory Data: 65	0.14	FILE
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INSTRUCTIONS FOR THE COMPLETION OF THIS FORMARE ON A
SEPARATE SHEET. THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

EPA Form 8700-22 (Rev. 4-85) MDNR-HWG 10

#### URI DEPARTMENT OF NATURAL RESOURCES Division of Environmental Quality

Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3241

# **HAZARDOUS WASTE MANIFEST**

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802

CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCES 314-634-2436

use print or type (Form designed for use on elite (12-pi		15 No.			Form Approved. O			
UNIFORM HAZARDOUS	1. Generator's US EPA	ID No.	Manifest Document No.	2. Page	Inform	ation in the s	haded ar	885
WASTE MANIFEST		11111		of .	is requ	ired by State	law.	
Generator's Name and Mailing Address  A A A A A A A A A A A A A A A A A A	t4. †±., €€.,	US EPA ID Number		9. State	ouri Manifest Docum Generator's ID - of Transporter's ID	0		`
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9. Designated Facility Name and Site Address	Car Ashid	D. US EPA ID Number		4	Facility's ID	्य		
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11. US DOT Description (Including Proper Shipping N		Number)	12. Contain		13. Total	14.	i. Waste N	<u> </u>
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J. Additional Descriptions for Materials Listed Above	· · · · · · · · · · · · · · · · · · ·			K. Hand	iling Codes for Was	tes Listed Abov	•	
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<b>b.</b> (1)	·-			1 1		1	1 ,	•
C. 11.4					, , ,	1 1	,	
d.								
15. Special Handling instructions and Additional Information (1997)  16. GENERATOR'S CERTIFICATION: I hereby declare to laboled, and are in all respects in proper condition to Unless I am a small quantity generator who has been have a program in place to reduce the volume and to or disposal currently available to me which minimized.	that the contents of this consistor transport by highway acc	ording to applicable intel letion from the duty to ma he degree I have determin	rnational and national ke a waste minimizatio led to be economically	governme n certifica	nt regulations and a tion under Section 3	pplicable state r 002(b) of RCRA.	egulations Lalso certi	ly tha
Printed/Typed Name	······································	Signature				Monti	Dey	Ya
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17. Transporter 1 Acknowledgement of Receipt of Mate	erials		****		<del></del>	<del>-  - -</del>	Date	
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and I will be to be the same	·				- 1			
18. Transporter 2 Acknowledgement of Receipt of Mate	erials						Date	
Printed/Typed Name		Signature				Month	Day	Ye.
9. Discrepancy Indication Space .								·
20. Facility Owner or Operator: Certification of receipt	of hazardous materials cove	red by this manifest exce	pt as noted in Item 19.			<del> </del>		
							Date	
Printed/Typed Name		Signature				Month	Day	Yes

THIS COPY IS TO BE RETAINED BY THE DESIGNATED FACILITY.

LS# 87039 (15%)

### ECCURET FOR ANALYSIS CHATRAL LABORATORY

(One Sheet per Group of Analyses)

		Date 1-7-87
Samuel To. or Identification: Transfer Requ	uisition No. 4	6803
Description of Sample: TRANSFORMER Oil From FAIR	OVIEW HEIGH	TS SURSTATION
(Three samples from each tanker compartment	t) Pumped into	the Day Tank at the
Analysis Desired: Total Halogens, Flash Point		
(Follow special waste oil analysis procedure		
analysis.)		•
Remarks: (Include special conditions which me Metals analyses to be sent out to Industrial		e of test)
CHARGE ACCOUNT:	Requested by:	P. Pike
Div. Major Minor Loc. Budget W.O.	Department:	Environmental Services
61 SIZ 80	Copies to:	J. Murphy - Ashley F. X. Blood J. K. Carpenter
<b>∵</b>	·	G. E. Kerr C. A. Zale File 23-01-B-1 File - Ashlev Oil
LABORATORY Data: FLASH POINT 136 F 18-87 WITOTAL HALOGEN: 4.003 %		
PCB: 7 DDM MIXED PCBS		
As: 22 ppm		
Recommendations: Ed 22 "	•	
Pb 25" BTU/16; 19439		, .
1370/16: 19,439		1.8

### MISSOURI DEPARTMENT OF NATURAL RESOURCES

P.O. Box 1368

Divisies of Environmental Quality Waste Management Program Jefferson City, Missouri 65102 314-751-3241



EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8602 CHEM TREC 1-800-424-9300

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TSDF FINAL COPY

-HIS DOCUMENT MUST BE SED FOR ALL MISSOURI-ESTINED SHIPMENTS.

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### **HAZARDOUS WASTE MANIFEST**

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UNIFORM HAZARDOUS	1. Generator's US EPA ID No.	Manifest	2. Page			Expues 7-31-8
WASTE MANIFEST	H O D O O O 6.8.7.3.9.2	Document No	01		ation in the	shaded areas
3. Generator's Name and Mailing Address	22	V 10 10 11 11		18 not	required by	Federal law.
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5. Transporter 1 Company Name				例识"		•
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8 Decimand Coding No.	<u> </u>	· · · ·			ne .	
9. Designated Facility Name and Site Ad	dress 10. US EPA ID Number		G. State	Facility's ID	1	
Ashley Plant	•			20		
Ashley&Wharf Sts.	•			y's Phone		
St. Louis, MO 63102	1		731	241-	14.6	
11 US DOT Description (Inclusive Barrers Co		12.Conta	iners	13.	14.	-
11. US DOT Description (Including Proper Sh	ipping Name, Hazard Class, and ID Num	ber)	1	Total		Waste No.
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15. Special Handling Instructions and Addit	ional Information			<u> </u>	<del></del>	
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16. GENERATOR'S CERTIFICATION: Thereby	declare that the contents of this consider	ant are fully as				
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8. Transporter 2 Acknowledgement or Rece	pipt of Materials	- (E 💸	Jac	<del></del>	3.9	
Printed/Typed Name	Signature		·			Date
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Printed/Typed Name				3		Date
Printed/Typed Name	Signature ( )	11/	(F)	<u></u>	Month	

500 80. 430° LS# 1094

# ELECTIFICATION ANALYSIS THOUSAND LABORATORY

(One Sheet per Group of Analyses)

		Date 9-5-86
Samla To. or Identification: Transfer	r Requisition No.	5069
Description of Sample: Waste Oil From		
(Three samples from each tanker compa	artment) Pumped int	o the Day Tank at the
Analysis Desired: Total Halogens, Flash		
(Follow special waste oil analysis proc		
analysis.)	MPDS1	TE sample
Remarks: (Include special conditions wind Metals analyses to be sent out to Indu		pe of test)
CEARGR ACCOUNT:	Requested by:	P. Pike
Div. Major Minor Loc. Budget V.O.	Department:	Environmental Services
61 512 80	Copies to:	J. Murphy - Ashley F. X. Blood
		J. K. Carpenter
	. ,	G. E. Kerr C. A. Zale File 23-01-B-1 File - Ashley Oil
Laboratory Data: Filed 1010 > 12	o'F	
total Halogens -	- 0.17%	,
ansenie 26 by a	st - 12	
Cadmium "	<u> </u>	•
Recommendations Chronium, 4	_ 3	
- Lead !!	- 1070	
BTV/el	- 17,330	)

FORM 4643 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM' ARE ON A SEPARIATE SHEET. THIS DOCUMENT MUST BE USED FOR THE MISSOURI-DESTINED SHIPMENTS

MISSOURI DEPARTMENT OF NATURAL RESOURCES Division of Environmental Quality

Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102

314-751-3241

EMEAGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300

### **HAZARDOUS WASTE MANIFEST**

se print or type. (Form designed for use on elite (12-pitch) typewriter)					2000-0404 Expires 7	
UNIFORM HAZARDOUS 1. Generator's US	7.3.5.6.6 SI Docu	lanifest Jment No.	2.Pag	******	tion in the shaded an equited by Federal is	
WASTE MANIFEST 18 0 8 0 3 5  3. Generator's Name and Mailing Address	· / · J · W · W · O · O · ·				Decument Number	
Union Electric Company						
12121 Dorsett Road, Maryland Heights,	MO ATOMS		A. St	1 le Gallaction 8		
4. Generator's Phone (************************************		<i>i.</i>	7			
5. Transporter 1 Company Name The Transporter 6.	US EPA ID Number	11:3	CH	Templif	D 419 1027	12(5
Union Electric Compression	0.0.0.96.7.38	5.0.5	O Tr	mepallers Pla	m #21-1772.21 %	377
7. Transporter 2 Company Name 8	US EPA D Number	(1.5	E M	. Traceporter's	Day of the second	1
9. Designated Facility Name and Site Address 10.	US EPA ID Number		F. 17	neparaty Pos le Facility & ID		
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St. Louis, 190 63197			1 6 7 4 4 4	1.511	translate PROTE TO All Library Co. A. C. C.	110
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Waste Oil, Combustible Liquid, N.O.S.	NAISO T	0.0.1	F4	2 600	THE REAL PROPERTY.	13 /4
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<b>b</b> .	•					
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(基礎等) 1997年於 國際海洋區標準 (1997年) 19	10000000000000000000000000000000000000	12.5				
	2、1月1日 新新四月間	Mer Si	i .			
If spilled, contain and clean up. Ken  16. GENERATOR'S CERTIFICATION: Thereby declare that the co above by proper shipping name and are classified, packed, m transport by highway according to applicable international regulations.	ontents of this consignment arked, and labeled, and ar	it <b>ar</b> e fully a e <b>in a</b> ll resp	ects in	proper conditio	<b>n</b> for	
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17. Transporter 1 Acknowledgement of Receipt of Materials					Date	
Printed/Typed Name	Signature				Month Day	Yea.
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18 Transporter 2 Acknowledgement or Receipt of Materials	<del></del>	· ——			Month Day	Yes
Printed/Typed Name	Signature				Moini Day	
19. Discrepancy Indication Space						
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Item 19					Date	
Printed/Typed Name	Signature	7.	. **	, <del>-</del>	Month Day	
					1/2/1/2/1	

### MISSOURI DEPARTMENT OF NATURAL REPOURCES

Division of Environmental Quanty
Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102
314-751-3241

55102

EMERGENCY RESPONSE: U.S. COAST GUARD 1-800-424-8802 CHEA\* TREC 1-800-424-9300

Form Approved OMB No. 2009-0403 Expires 7-31-86

THIS DOCUM "IT MUST BE USED FOR! L MISSOURI-DESTINED SHIPMENTS.

(Form designed for use on elite (12-pitch) typewriter)

Please print or type

### **HAZARDOUS WASTE MANIFEST**

WASTE MANIFEST	senerator's US EPA ID No.	Manif Documer D & &	I No.		on in this shaded areas uired by Federal law.
3. Generator's Name and Mailing Address.	)4E		A		ocument Number
4. Generator's Phone	•		8. Stat	6 Germane	
5. Transporter 1. Company Name	6 US EPA ID	Number ( ) G	G. MO	i e iurerung. Port grentegen	
7. Transporter 2 Company Name	8. US EPA ID		E. MO	Transporter a it.	Market Service
9. Designated Facility Name and Site Address	s 10. US EPA ID	Number		spores Photo	
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5. Special Handling Instructions and Addition		14:		W.P.P.C. U	
IF SPILLED, CONTRACT	CLE	î 4 de	. Pitter	11/11/30	1870000
6. GENERATOR'S CERTIFICATION: Thereby dec above by proper shipping name and are classif	ied, packed, marked, and la	abeled, and are in a	ll respects in p	roper condition fo	
transport by highway according to applicable regulations.	e international and nation	al governmental i	egulations an	d applicable sta	Date
Printed/Typed Name	Signat	U78			Month Day Yes:
7. Transporter 1 Acknowledgement of Receip	t of Materials				Date
Printed/Typed Name	Signat	ure		4	Month Day Year
8. Transporter 2 Acknowledgement or Receip	t of Materials				Date
Printed/Typed Name	Signat	Ore Document	, <b>b</b> <sub><b>a</b>1, 12</sub>		Moder buy You
9. Discrepancy Indication Space		1			
20. Facility Owner or Operator: Certification of r	eceipt of hazardous mate	rials covered by t	nis manifest e	except as noted	Date 1
Printed/Typed Name Joseph Ovies	Signat	ure		·.	Month Day Year
				<del></del>	

500 50. 430 15#861487

# EIGUER FOR ARLIEUS THOUGHT LARGEST LAR

(One Sheet per Group of Analyses)

			Deta 12-23-86
Samia No. er Identifi	cation: Transfer Re	eguisition No.	5097
Description of Sample:  (Three samples fro	Waste Oil From (	DORSETT WAR ment) Pumped int	ENOUSE AND VENIER PLAN the Day Tank at the
Analysis Desired: Tota	al Halogens, Flash Poir	nt (Closed cup to	140 <sup>o</sup> F), Metals (As, Cd, Cr, Pb)
analysis.)	e oil analysis procedur	e for bottle clear	ning, compositing and
	pecial conditions which be sent out to Industri	•	•
CEARGE ACCOUNT:		Requested by:	P. Pike
Div. Major Minor Lo	c. Budget W.O.	- Department:	Environmental Services
61 512	80	Copies to:	J. Murphy - Ashley F. X. Blood J. K. Carpenter G. E. Kerr C. A. Zale File 23-01-B-1 File - Ashley Oil
Laboratory Data:	FLASH PT.		
	TOTAL HALOGO  Cp: 42 pm:  Cr: 7,2 pp.	יינ	•
Recommendations:	Pb: 168 ps As: 42 pp	<sup>2</sup> m	

### Day Tank Weekly Inspection

Inspection Date $6/13/87$ Time $400\rho n$
Inspector's Name J. HALEY
A. Visually check the following for any sign of leakage:
1. Tank Structure
2. Drain Valve
3. Suction Heater c
4. Fill Piping
B. Visually check the following for any sign of deterioration or need of repair:
1. Earth Containment Dike
2. Concrete Wall
3. Fence C
Note helew par maneine would be

Note below any repairs needed. If none are needed state so. If a repair or remedial action has been taken, state nature of action and the date.

all E.K.

Signed J. Kinky

Forward this report to the Engineering Office when complete.

# HAZARIX)US WASTE RECEIVED REPORT

Date Received 1/14/86
Date Inspected 1/14/8-6
Inspector's Name
Accompanying Manifest Document Number
Description of Waste Material Waste oil flamable
liquel NOS UN 1993
Does the received waste material match the identity of the waste designated on the accompanying manifest?
Remarks or Observations:
al Prohed up at a port del
2,000 7 €
Notice
Signed Januar

Job No. 1184 1/9/81

Please forward this form with accompanying manifest to the Engineering Office.

#### ORM 4643 MSTRUCTIONS: FOR THE IOMPLESION OF THIS FORM REON A SEPARATE SHEET.

'HIS DOCUMENT MUST BE SED FOR ALL MISSOURI— ESTINED SHIPMENTS.

### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102
314-751-3241

FMERGENCY RESPONDED US COAST GUARD.
1-800-424-8802
CHEM TREC

1-800-424-9360

### **HAZARDOUS WASTE MANIFEST**

(Form designed for use on elite (12 pitch) typewriter) ease print or type Form Approved, OMB No. 2000, 04:14, Expires 7, 31, 60. 1. Generator's US EPA ID No UNIFORM HAZARDOUS Manifert Information in the shaded areas Document No WASTE MANIFEST is not required by Federal law. 3. Generator's Name and Mailing Address A. Missouri Manifest Document Number LINE RESIDENT 1 1 7 B. State Generator's ID - other 4. Generator's Phone ( 37/4') 5 Transporter 1 Company Name 6. US EPA ID Number C. MO Transporter's ID D. Transporter's Phone 7. Transporter 2 Company Name 8 US EPA ID Number E. MO Transporter's ID 7 600 F. Transporter's Phone 9. Designated Facility Name and Site Address 10 US EPA ID Number G. State Facility's ID H. Facility's Phone 12 Containers 13 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number, Total Unit I. Waste No. Quantity **∧**•/√s/ A Jumpalle L CM Other MO. Other Other J. Additional Descriptions for Materials Littled Above K. Handling Godes for Wastes Listed Above 1.7.+ <u>ķ</u>. ; 15. Special Handling Instructions and Additional Information and Committee and Charm 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state regulations. Printed/Typed Name Month Day Yesi Tong of the But Fla 17. Transporter 1 Acknowledgement of Receipt of Materials f)ate Rinted/Typed Nume Month Day 18 Transporter: 2 Acknowledged and or Receipt of Materials Printed/Typed Name Month Day なる。独立の語のい Discrepancy Indication Space Month Day Year

#### **FORM 4643** INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS POCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

#### **MISSOURI DEPARTMENT OF NATURAL RESOURCES**

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102 .314-751-3241



**EMERGENCY RESPONSE** U.S. COAST GUARD 1.800.424.8802 CHEM TREC 1-800-424-9300

Form Approved OMB No 2000-0404 Expires 7 31-86

### HAZARDOUS WASTE MANIFEST

(Form designed for use on elite (12-pitch) typewriter) 1. Generator's US EPA ID No. Manifest UNIFORM HAZARDOUS Information in the shaded areas **Document No** M.O.P.O.S. 6. 7. 3. 3. 6 0 is not required by Federal law. WASTE MANIFEST 3. Generator's Name and Mailing Address A. Missouri Manifest Document Number A. 1. 解計時 120.7. Union Electric Company B. State Generator's ID - other 12121 Dorsett Rd., Maryland Heights, 120 (3042) U375 1 4. Generator's Phone ( 6. US EPA ID Number 5. Transporter 1 Company Name C. MO. Transporter's ID 19-2. 7 pr.6.8.6.9.4.1.1.1.3.1. Anion Electric Company 17.25 D. Transporter's Phone 7. Transporter 2 Company Name 8. US EPA ID Number E. MO. Transporter's ID F. Transporter's Phone . . . . . . . . . . . . . . . 9. Designated Facility Name and Site Address 10. US EPA ID Number G. State Facility's ID COPY ૣૹ૽ૢૼૣઌ Silve Bear A AR Ter St. H. Facility's Phone 10. It is, 179- 67107 dae. ENERATOR FINAL 12 Containers Unit | I. Waste No. 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Quantity MO. Wast: Cit, Combustible Lieuld, J. C. Carlott Other V . . . . . MO Other MO. Other MO. đ. Other K. Handling Codes for Wastes Listed Above Additional Descriptions for Materials Usted Above والمراجع والمراجع والمراجع . !: 1 100 2 1 · NAME OF THE PROPERTY OF THE PARTY OF THE P Apr los in the case ÷. 輟 iv. 15. Special Handling Instructions and Additional Information and the second of the second of 医精体 医自己性病 GENERATOR AFTER 16. GENERATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state Date regulations. Month Day Signature Year Printed/Typed Name THE ( 17. Transporter 1 Acknowledgement of Receipt of Materials Date 20 Month Day Year Signature Printed/Typed Name . . . y . . Date 18. Transporter 2 Acknowledgement or Receipt of Materials Month Day Year Signature Printed/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Month Day Year Signature Printed/Typed Name . PA Form \$700-22 (3-84) MDNR-HWG 10

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Jub	Hc.	430
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# ETETLARA NON TREUETH TROTANDRAL LARTHUD

(One sheet per Group of Analyses)
Composite Sample

		•	Tate_0 - 0 - 8 /
Sample Mo. or Identification: Transf	fer Requ	isition No.	6811
Description of Sample: Wasce Oil Fr	roin Do	RSETT L	JAREHOUSE
(Three samples from each tanker com			
Analysis Desired: Total Halogens, Flash	h Point (	Closed cup to	140°F), Metals (As, Cd, Cr, Pb
(Follow special waste oil analysis pro			
analysis.), BTU/Lb.			
Ramarks: (Include special conditions  Metals analyses to be sent out to Inc			ege of tast)
CEARGE ACCOUNT:		Requested by:	
Div. Major Minor Loc. Budget W.O.	_	Department:	Environmental Services Dept.
61 512 80	-	Copies to:	J. D. Murphy - Ashley Plant F. X. Blood - Lab. Services J. K. Carpenter - Lab. Services G. E. Berr - Lab. Services D. C. A. Zale - Lab. Services D.
			G. S. Kramer - Fessil Fuel De File 23-01-B-1
Laboratory Data:			File - Ashley Oil
Flash pt - 130°F		·	
HALDERENS 2,0%			
137U/16: 16.48X Z	174/16		·
Pacomeno econs: As 22 p	77772		
(1) 22	.,		***
Cr: 16	',		
- 162	· · · · · · · · · · · · · · · · · · ·		

A Form 8700-22 (3-84) MDNR-HWG 10

U.S. COAST GUARD 1-800-424-8802 CHEM TREC

- PART

OPTIONAL STATE COPY

Please print or type (Form designed for use on elite	(12-pitch) typewriter (		,				B00-424-		
UNIFORM HAZARDOUS	1. Generator's US EPA ID No.	Manifest	i / Pan	pproved OMB	No 2000	0404 Exp	⊪es 7-31		
WASTE MANIFEST	<u></u>	Document No			nation ir	n the shad	ed areas		
3. Generator's Name and Mailing Addre	ess			ssouri Manife	require	d by Fede	ral law.		
252.52 Providing 1 1999			7 10111	SSOUL MAINE	SI DOCU	ment Num	iber		
<ul> <li>1747 Technology of the</li> </ul>	ota e de la companya		-	·		•			
4 Generator's Phone (			B Sta	te Generator'	s ID - ot	.her			
5 Transporter 1 Company Name	6. US EPA ID Numi	her	<del> </del>	C. C. and Service					
Mark Managers of the			C MC	C MO. Transporter's ID					
7. Transporter 2 Company Name	8. US EPA ID Numb	bor	D. Transporter's Phone  E. MO. Transporter's ID						
	1								
9. Designated Facility Name and Site A	ddress 10. US EPA ID Numb	10. US EPA ID Number			F. Transporter's Phone				
Siler : La :	The second second	Je1	G. Stat	e Facility's ID	الأخر	3.50 3.5			
i islidey Aurest					,	(A. A. Walking			
7 2 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	1			ility's Phone	-				
		1100	7.99	-3220 19	4 98	7-34			
11. US DOT Description (Including Proper St	upping Name, Hazard Class, and ID I	Vumber)	iners	13. Total	14.				
8.				Quantity	Unit Wt/Vol		ite No.		
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d.					] ]	Other			
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J. Additional Descriptions for Materials Listed	1 Above				1 1	Other			
a.			K. Hand	ling Codes fo	r Waste	s Listed A	bove		
b.				· ·	<u> </u>				
C.			·	<u> </u>					
d.			• •			.			
5 Special Handling Instructions and Addit					T				
6. GENERATOR'S CERTIFICATION: Thereby above by proper shipping name and are class				·					
transport by highway according to applicate regulations.	sified, packed, marked, and labeled, able international and national gove	nmentare fully and and are in all respe irnmental regulation	l accuratets in pro ons and	ely described per condition applicable st	for ate				
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7. Transporter 1 Acknowledgement of Rece	upt of Materials	· · · · · · · · · · · · · · · · · · ·					4		
Printed/Typed Name	Signature				—— <del></del>	Date onth Day			
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3. Transporter 2 Acknowledgement or Rece	ipt of Materials								
Printed/Typed Name	Signature		<del></del>			Date			
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Discrepancy Indication Space				····			لنا		
) F									
Pacility Owner or Operator: Certification of Item 19.	receipt of hazardous materials cov	ered by this mani	fest exce	ept as noted	ın				
Printed/Typed Name	Signature			··	$\bot$	· Date			

Signature

THIS COPY IS TO BE SENT TO THE GENERATOR'S STATE (IF APPLICABLE)

Month Day Year

Hachwe Form No. LSB-005-4

Form Approved Füdget Bureau No. 44-R1387 Approval Expires April 30, 1971

## U.S. DEPARTMENT OF LABOR

WAGE AND LABOR STANDARDS ADMINISTRATION
Bureau of Labor Standards

# MATERIAL SAFETY DATA SHEET

SECTION	
MANUFACTURER'S NAME PENETONE CORPORATION	EMERGENCY TELEPHONE NO. (201) 567-3000
C. C. J. ZIP Code)	TRADE NAME AND SYNONYMS NAVITONE
	RMULA

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS		TLV (Units)
PIGMENTS			BASE METAL	$\downarrow \downarrow$	
CATALYST			ALLOYS	1-1	
VEHICLE		,	METALLIC COATINGS		
SOLVENTS Aromatic petroleum hydro-	40	200	FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES Carbon			OTHERS		
OTHERS .					
MAZARDOUS MIXTURE	S OF C	THER LIG	UIDS, SOLIDS, OR GASES	*	(Units)
HAZANDOO MILONO					
1: 1-78-87		/	is 42% promatic HC		
6= per 1 (con 1-28-82 = 317 p= 1 not copies cos		-1	97 of 10121		

		TIN BILL	TSICALUATA	
BOILING POINT (F.)		2120F	SPECIFIC GRAVITY (H20=1) @ 20°C	.998
VAPOR PRESSURE (mm Hg.)		2	PERCENT VOLATILE # 105°C	75%
VAPOR DENSITY (AIR=1)		5	EVAPORATION RATE	0.04
SOLUBILITY IN WATER	Emuls	fiable	acetate	
APPEARANCE AND ODOR	Light green	liquid	with an aromatic odor	ne også mår tillstættet de

SEGIOD-IV TREADDE	PLOSION HAZARD DATA		
The state of the s	FLAMMABLE LIMITS	Lel	Uel
FLASH POINT (Method used) C.) None to boiling			
EXTINGUISHING MEDIA CO2, dry powder			
SPECIAL FIRE FIGHTING PROCEDURES Use air-supplied rescue equipment	for enclosed area	s. Vapor	
Use air-supplied rescue equipment	L containers with	water.	
harmful. Stay upwind. Cool exposed	Containers with		
UNUSUAL FIRE AND EXPLOSION HAZARDS Not applicat			
		and the second s	Sales Sales Sales

### U.S. DEPARTMENT OF LABOR cupational Safety and Health Adminit

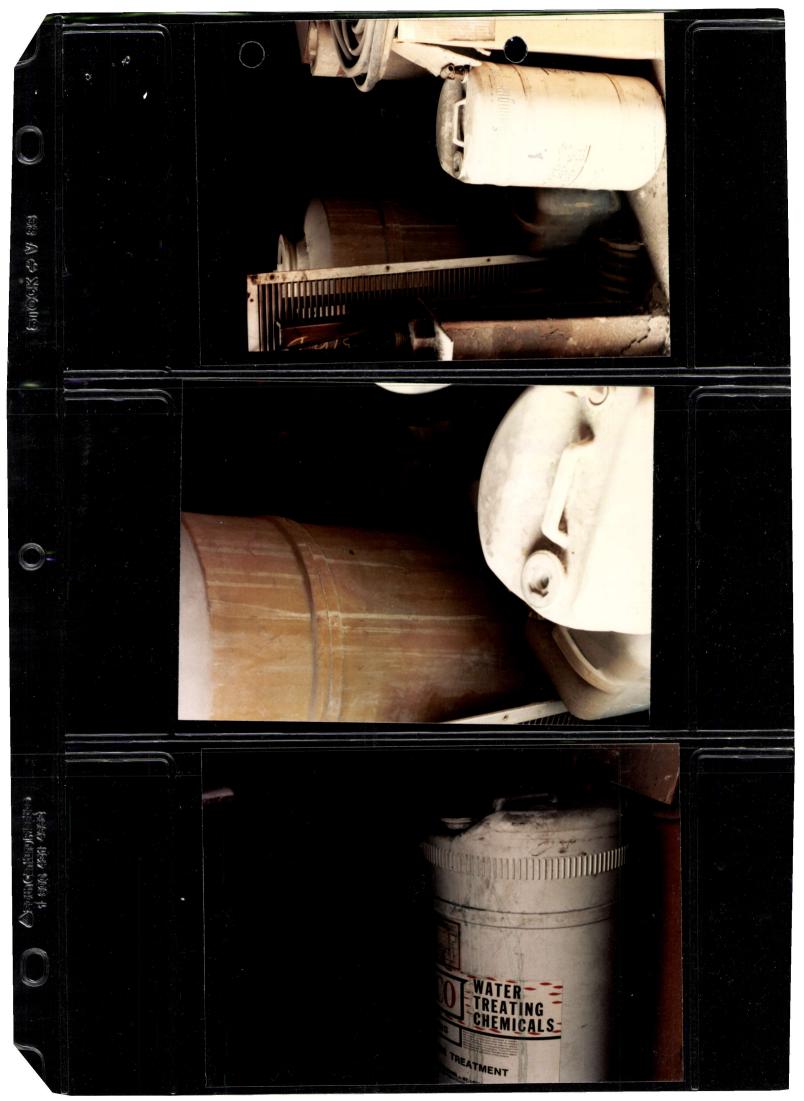
# Form Approved OMB No. 44-81387

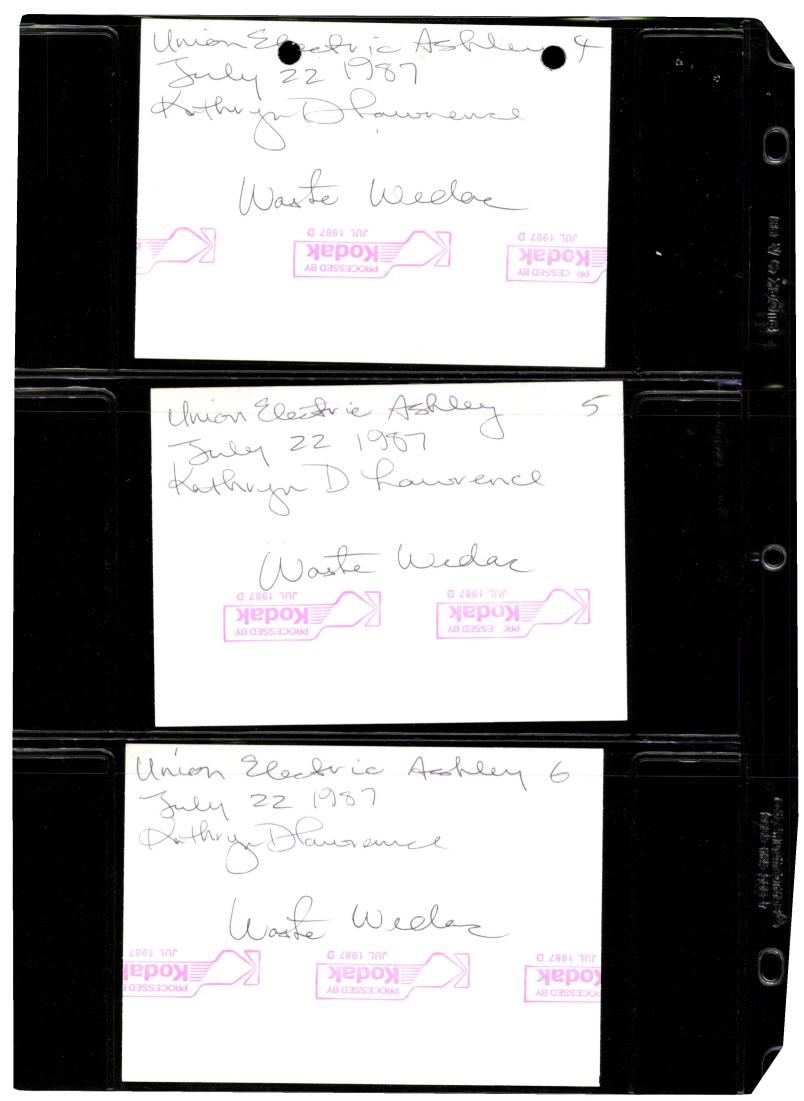
# MATERIAL SAFETY DATA SHEE

		SECT	TION I			
MANUFACTURER'S NAME West Chemical Products, Inc.			EMERGENCY TELEPHONE NO. 213-263-4108			
ADDRESS (Number, Street, City, State, and ZIP C	odeCA	90023				. •
CHEMICAL NAME AND SYNONYMS	<del>-i</del>	•		MANE AN (1824) ON YMS		•
CHEMICAL FAMILY N/A		• •	FORMULA N/A			
SECTIO	V 11 -	HAZAF	RDOUS INGRED	DIENTS		
PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS ANI	METALLIC COATINGS	%	TLV (Units
PIGMENTS	1//	١	BASE METAL		N/	<u> </u>
CATALYST	N/	\	ALLOYS		N/A	<b>A</b>
VEHICLE	N/	4	METALLIC COATI	NGS	N	Α
SOLVENTS	N/	Α	FILLER METAL PLUS CONTING OF	R CORE FLUX	. N/	<u>^</u> .
ADDITIVES	N/	A	OTHERS .		N!//	4
OTHERS	N/	4			N/A	4 .
HAZARDOUS MIXTURE	SOF	THER LI	QUIDS, SOLIDS, OR	CASES	% .	TLV (Units
(P-105P	HORI	<b>C</b> )	<i>-</i> 1	Viineral Acid	75	l mg
			••	;	•	•
•			<u> </u>			
05.	27121	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\			<del></del>	
	· · · · · ·		PHYSICAL DATA		1.75 Julius	
BOILING POINT (°F.)	_   2	15	PERCENT, VOLAT	····		.40
VAPOR PRESSURE (mm Hg.)		.K.	BY VOLUME (%)	IE (%)		1
VAPOR DENSITY (AIR=1)	U	.K.	EVAPORATION RA	Greater than	1	<u>.</u>
SOLUBILITY IN WATER	Cor	nplete		·		
APPEARANCE AND ODOR Clear ambe	r lic	uid, pla	casani aroma	····		
SECTION IV -	FIR	E AND I	EXPLOSION HA	ZARD DATA		
FLASH POINT (Method used) C.O.C.		, <u>, , , , , , , , , , , , , , , , , , </u>	FLAMMABLE L	.IIIITS Lei	K	Uei
EXTINGUISHING MEDIA	<u></u>		1		<u></u>	
PLOIAL FIRE FIGHTING PROCEDURES	Non	e				
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Ivion Fedre Ashlu July 22 1987 #6 Juel oil South ■ 7861 JUL Q 7861 JUL KOQSK Kodak Union Electric Ashley July 22 1987 Lawrence # 6 Feel oil faule Q 7861 JUL Q 4861 JUL MS ESSED BY Kodak PROCESSED BY Union Electrice Ashley July 22 1987 Junes of waste oil/ Dargman Ja 2861 700 Kodak 3 UEA plant ROCESSED BY





REPORT OF RCRA COMPLIANCE INSPECTION

AT

UNION ELECTRIC CO. / ASHLEY FACILITY

ST. LOUIS, MISSOURI

EPA I.D. NUMBER: MOD000805499

ON

JULY 21-22, 1987

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

#### INTRODUCTION

At the request of the Waste Management Division (WSTM), a compliance evaluation inspection (CEI) was performed at Union Electric Company's Ashley Facility in St. Louis, Missouri on July 21-22, 1987. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This report and its attachments present the results of the inspection.

#### **PARTICIPANTS**

Union Electric Ashley Facility (UEA):
Don Crawford, Plant Manager
Paul Pike, Environmental Specialist

U.S. Environmental Protection Agency (EPA) : Kathryn Lawrence, Environmental Engineer

#### INSPECTION PROCEDURES

Upon arrival at the facility, I met with Paul Pike who introduced me to the plant manager, Don Crawford. Mr. Crawford escorted us to his office. At that time, I presented my EPA credentials and explained the purpose of the inspection and the procedures that I would follow. The inspection consisted of a discussion of UEA's hazardous waste management activities, a record review, and a visual inspection. At the end of the visual inspection, I conducted an out-briefing. I discussed my findings and observations with the representatives and Mr. Crawford signed a

document receipt and Confidential Business Information (CBI) form which claimed that none of the information gathered during the CBI needed to be handled as CBI. These documents are provided in attachments 1 and 2, respectively. No NOV was issued at the end of this inspection.

#### FACILITY DESCRIPTION

The Union Electric Ashley Facility is located at 4 Ashley Rd. in St. Louis, Mo. The facility is a power plant which generates electricity for the St. Louis metrópolitan area. The plant uses number six fuel oil to feed the plant boilers which in turn generate turbine steam for the generation of electricity. UEA submitted a notification of Hazardous waste activity on 1/31/87 which listed the facility as a burner of hazardous waste fuel and off-specification oil. This notification also provided that UEA would burn these fuels in a Utility Boiler. The facility also received a resource recovery permit from MDNR on September 24, 1986. The Permit does not specify burn parameters.

#### FINDINGS AND OBSERVATIONS

UEA only accepts and burns off-specification fuel oil from other Union Electric divisions. Hazardous waste fuel was not being accepted or burned at the time of this inspection. With the exception of one of the Union Electric divisions, the Union Electric Dorsett facility, all are reportedly conditionally exempt small quantity generators. The Dorsett facility falls into small quantity generator status four times annually when it generates and ships quantities of Safety Kleen solvents. However, all waste fuels received by UEA are defined as off-specification used oil.

#### A. Waste Streams

1. Off-specification Used Oil UEA receives approximately 10,000 gallons of used oil per month from other Union Electric divisions. According to facility representatives, the waste oil that UEA receives is only non-PCB oil. It is received on a bi-weekly basis and is mixed with number six fuel oil in a 250,000 gallon tank before being burned in the facility boilers. UEA performs analyses on all received oil, which is transported in a four compartment Three samples are taken at varied depths in each compartment, composited, and analyzed. A number of these analyses are provided in attachment 3. It should be noted here that the majority of the analyses provide that the halogen content of the oils received is above 1000 ppm. Pursuant to 40 CFR 266.40(c), used oils containing greater than 1000 ppm halogens are assumed to have been mixed with hazardous wastes unless the facility can prove otherwise. UEA representatives provided that the high halogen content was due to the detergents that are present in many of the oils before use. Although this appears to be a viable explanation, another possibility may be the introduction of PCB contaminated oils into the used oil transported to UEA. Since UEA does

not perform PCB analyses on the used oil, sufficient information was not available to make an accurate determination of the used oil's PCB content. However, the possibility of PCB contamination may warrant further investigation.

The used oils generated by UEA are also mixed with clean fuel oil in the #6 fuel oil tank to be burned in the facility boilers. The burn rate for the mixed oil is reportedly 125,000 gallons per week.

#### 2. Waste Solvent

The only solvent used in UEA maintenance activities is mineral spirit based Navitone. It solvent is used in two parts washers in the maintenance shop and is also used to clean burning guns. According to the attachment 4 material safety data sheet, Navitone has a boiling point of 212F and a flash point above 212F. It is not a hazardous waste when spent. Approximately 300 gallons of waste navitone are generated per annum and are mixed with used oil for burning in the facility boilers.

#### B. Records

#### 1. Inspection Record

UEA personnel inspect the number 6 fuel tank on a weekly basis. An example of the facility's logsheet is provided in attachment 5.

#### 2. Manifests

Manifests are reportedly used for all shipments of waste oil. A number of examples are provided in attachment 6.

#### 3. Analyses

As discussed above, UEA performs analyses on each batch of used oil that is received. A number of analyses are provided in attachment 3.

#### 4. Notifications

UEA has not received marketer notification form the Union Electric divisions that ship off-specification oil to the facility. In addition, UEA has not provided off-specification used oil burner notification to those division. Facility representatives stated that they did not believe the notification to be necessary since both burner and marketer were essentially part of the same company.

#### C. Visual Inspection

#### Fuel Tank (Photographs 1-2)

Photographs 1-2 depict UEA's #6 fuel tank. Oil stains were observed on the surrounding soils. However, the stains appeared to be due to de minimus losses from line drippings. No problems were observed in this area.

#### 2. Maintenance Shop

The maintenance shop was inspected during this RCRA CEI. The only RCRA regulated wastes generated at this location were small quantities of

lubricating oils. These oils are collected and mixed with other oils in the #6 fuel tank. The two parts washers described above are located in the shop. However, they do not generate any hazardous wastes. No problems were observed in this area.

- 3. Plant Floor (Photograph 3)
  During the inspection of the plant floor, I observed 7 drums of used oil and 1 drum of Navitone in a maintenance station in the plant basement. Facility representatives stated that the drums were being stored at that location until they could be pumped into the #6 fuel tank. No problems were observed in this area.
- 4. Thermal Resources (Photographs 4-6)
  Thermal Resources (TR) has purchased the UEA facility and contracted
  Union Electric employees to operate the power plant. However, another
  portion of the facility is both owned and operated soley by Thermal
  Resources. The TR operated area is in a building separate from and
  adjacent to the power plant. The building houses TR employee
  offices and a small maintenance shop. Maintenance shop activities
  result in the generation of approximately 20 gallons per year of a
  spent mineral acid-based cleaning solution called Wedac. The Wedac
  material safety data sheet (MSDS) is provided as attachment 7.
  Although the safety data sheet does not provide sufficient
  information to make a determination of the waste's regulation, the
  spent material may be corrosive. The MSDS does provide that Wedac
  is metal reactive. TR has not analyzed the Wedac waste.

At the time of this inspection, I observed several containers of spent Wedac in a storage building near the maintenance shop. Photographs 4-6 depict the area in which the containers were stored and it appeared that the combined capacity of the containers was approximately 65 gallons. At the time of this inspection (contingent upon the spent Wedac being RCRA regulated), the facility would have been considered a regulated SQG, since the quantity of waste stored exceeded 100 kg. (Missouri Regulations). However as of August 1, 1987, the TR facility appears to be a conditionally exempt SQG since the waste generation rate is less than 100 kg/mo. and the quantity of waste stored does not exceed 1000 kg. It should be noted here that a complete RCRA CEI was not conducted at this location due to its independence from the facility for which the inspection request was made. However, TR representatives stated that the Wedac would be analyzed and, if necessary, disposed as a hazardous waste.

#### CONCLUSIONS AND RECOMMENDATIONS

#### D. Conclusions

The Union Electric Ashley facility is a RCRA regulated burner of off-specification used oils. The facility does not appear to generate any hazardous wastes other than used oil. At the time of this inspection, it appeared that UEA was in compliance with the RCRA regulations and Missouri environmental laws.

E. Recommendations

As discussed in report section A1, it appears that the possibility of PCB contamination of the UEA used oils may warrant further investigation.

Lawrence

Activity Number:

Date: 9-14-87

#### ATTACHMENTS

- 1. Document Receipt
- 2. CBI Form
- 3. Analyses
- 4. Tank Inspection Log Sheet
- 5. Manifests
- 6. Navitone Material Safety Data Sheet
- 7. Wedac Material Safety Data Sheet
- 8. Photographs

## U.S. ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address	Firm Name and Address UNION ELBOTRIC + ASHLEY ST. LOUIS, Ma
U.S. EPA, Region VII ENSV Division 25 Funston Road	Name of Individual  CRAWFORD
Kansas City, Kansas 66115	TITLEPLANT MGR.
Date Collected   Samples were:  ( ) Purchased	( ) Received no charge ( )Borrowed
Sample Numbers	Amount paid for Samples
	d of Payment
( ) Yes ( ) No ( )	Cash ( ) Voucher ( ) To be Billed

of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged:

WASTE OIL ANALYSES WASTE ANALYSES (Corrosives) MANWESTS INSPECTION LOCA BURN GUN SOLVENT ANHUSES WASTE INVENTORY

Signature (Owner, Operator, or Agent	Title
Hon W Granford	Plant Mga.
Name of Inspector Title	
11), BUNIEON/MENYAL	Inspector's Sygnature
LYPHRYN DLAWREDCE ENGINEER	John towers

## U.S. ENVIRONMENTAL PROTECTION AGENCY RCRA INSPECTION CONFIDENTIALITY NOTICE

Name and Address of Inspector(s)	Name and Address of Facility  UNION ELECTRIC  4 ASHUEY  DT. LOUIS MO
U.S. EPA, Region VII ENSV Division 25 Funston Road	Owner, Operator, or Agent in Charge  DON CRAWFORD
Kansas City, Kansas 66115	PLANT MGR.
	Address SAME
Name of Individual to Whom Notice Given  CRAWERD	Title PLANT Date, 17/1/87

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FDIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets <u>all</u> of the following criteria:

- 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
- 3. The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA	INSPECTION	CONFIDENTIALITY	NOTICE	Facility	A Company	·
			. *	UNION	ELECTRIC	(ASKIEY)

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

> Mr. David A. Wagoner Director, Waste Management Division United States Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treat-0wn tre tia

To be completed b	y the facili	ty officia	l receiving	g this Noti	ce:
I have received a	ınd read this	Notice.			
Name			•		•
Title	•				
Signature .					•
Date				•	•
If there is no or make business cor and other inspect	fidentiality ion material	claims for s will be s	the firm. sent to the	, a copy of e Owner, Op ner company	this Noterator, official
Agent in charge of			n, please o	iesignate b	elow:
			n, please o	iesignate b	erow:
Agent in charge of who should also r			n, please o	esignate b	elow:

#### U.S. ENVIRONMENTAL PROTECTION AGENCY 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

## REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual  Don CRAWFORD	Title PLANT MGR	Date 7/22/	/87
Firm Name UNIOW ELECTRIC	Firm Address 4 ASHLEY ST. LOUIS, M	Ó	

Information for which Confidential Treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures: (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial of quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)  Son Wantford	Title Plant Manage
Name of Inspector / Title	Inspector's Signature
KATHRUND LAWRENCES ENGINEER	Pathy Laurence

ASDM 50M

## HAZARDOUS WASTE RECEIVED REPORT

Date Received	
Date Inspected 2 - 6 - 87	
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signed S. Phifer	
Signed 1. f. hiker	

Job No. 1184 1/9/81

Please forward this form with accompanying manifest to the Engineering Office.

Premierd into Doy Fank, 0/9/87, AM. Sam

10

FORM 4643 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI—

EPA Form 8700-22 (3-84) MDNR-HWG 10

#### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102
314-751-3241

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC

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	9. Designated Facility Name and Site Address 10	D. US EPA ID Number		G. State Fac	ter's Phone	1. 1		
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	16. GENERATOR'S CERTIFICATION: Thereby declare that the co	ontents of this consignment	t are fully ar	nd accurately o	described			- H
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FORM 4643 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

#### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102 314-751-3241

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300

#### HAZARDOUS WASTE MANIFEST

(Form designed for use on elite (12-pitch) typewriter.) Please print or type. Form Approved, OMB No. 2000-0404, Expires 7-31-86 1. Generator's US EPA ID No. Manifest 2. Page / UNIFORM HAZARDOUS Information in the shaded areas Document No. WASTE MANIFEST is not required by Federal law. 3. Generator's Name and Mailing Address

WENTE POWER PLANT

MAIN & MCKINLEY BRIDGE

VENICE, ILL. 82090

4. Generator's Phone (314) 621-322 A. Missouri Manifest Document Number 1376000 B. State Generator's ID - other 6. US EPA ID Number 5. Transporter 1 Company Name C. MO. Transporter's ID MOD 096733605 D. Transporter's Phone 62/ Transporter 2 Company E. MO. Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address
ASHLEY FOWER PLANT 10. US EPA ID Number G. State Facility's ID 4 ASHLEY STREET br Facility's Phone ST. LOUIS 12.Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Unit I. Waste No. Quantity OIL - COMBUSTIBLE MO. O. O 200 N.O.S. NA 1993 Other h MO. Other MO. Other MO. d. Other J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above 1. . . . . 1 10. 40 N. E. F. 112 TLL. TRANSPORTOR # 1118004 TLL. FACILITY # 921890008 15. Special Handling Instructions and Additional Information SPILLED, CONTAIN AND 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state regulations. Date Month Day Printed/Typed Name Signature 0 210.5 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Month Day Signature 02051 @Mes 18. Transporter 2 Acknowledgement or Receipt of Materials Date Month Day Printed/Typed Name Signature 19. Discrepancy Indication Space Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year

MISSOURI DNR FINAL COPY

EPA Form 8700-22 (3-84) MDNR-HWG 10

## INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET.

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MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3241

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8002 CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCES 314-834-2438

#### **HAZARDOUS WASTE MANIFEST**

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_	19. Discrepancy Indication Space					
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L	20. Facility Owner or Operator: Certification of receipt of h	azardous materials covered by this manifest exc	cept as noted in Item 19	·•		
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## INSTRUCTIONS FOR THE COMPLETION OF THIS FORMARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

EPA Form 8700-22 (Rev. 4-85) MDNR-HWG 10

#### **MISSOURI DEPARTMENT OF NATURAL RESOURCES**

Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3241

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE
U.S. COAST GUARD
1-900-424-5802
CHEM TREC
1-500-424-9300
DEPT. OF NATURAL RESOURCES
31-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2000-0404, Expires 7-31-56 1. Generator's US EPA ID No. UNIFORM HAZARDOUS Manifest 2. Page Information in the shaded areas **WASTE MANIFEST** is required by State law. 3. Generator's Name and Mailing Address Minerard Manifest Decrement America B. State Generator's ID - wiher 5. Transporter 1 Company Name 6. US EPA ID Number C. MO. Transporter's ID 00096 D. Transporter's Phone ( MOICH 7. Transporter 2 Company Name 8. US EPA ID Number E. Mo. Transporters ID F. Transporter's Phone 9. Designated Facility Name and Site Address 10. US EPA ID Number G. State Facility's ID THE PERSON NAMED IN H. Fecility's Phone 63102 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 12. Containers 13. Total Unit Quantity Wt/Vol OMBUSTIBLE LIQUID NOS. NA. 1993 Othor GENER MO Other MO 0 Other d. NO. Other J. Additional Descriptions for Materials Listed Abovo K. Handling Codes for Wastes Listed Above 15. Special Handling Instructions and Additional Information 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. Printed/Typed Name Signature OHHE Date 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature ames 18. Transporter 2 Acknowledgement of Receipt of Materials Date Day Month Printed/Typed Name Signature 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Month Dav Printed/Typed Name

4IS CORY MUST BE SENT BACK TO THE GENERATOR BY THE DESIGNATED AND THE DESIGNATED TO THE REPARTMENT BY THE RENEBANDS

L, S, # 87201

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ion:	Transfer	Requ	isiti	on.	No.	2

		1	Date <u>0-7-8</u> /
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Description of Sample: Waste Oil Fro	om Veni	LE PLANT, 18.	28 GRATIOTST., SODE. BROAD
(Three samples from each tanker com	partmen	t) Pumped int	to the Day Tank at the Ms.
Analysis Desirad: Total Halogens, Flash			
(Follow special waste oil analysis pro			
analysis.), BTU/Lb.			
Remarks: (Include special conditions Metals analyses to be sent out to Ind			rpe of test)
CEARCE ACCOUNT:		Bequested by:	P. R. Pike
Div. Major Minor Loc. Budget W.O.		Department:	Environmental Services Dept.
61 512 80		Copies to:	J. D. Murphy - Ashley Plant F. X. Blood - Lab. Services J. K. Carpenter - Lab. Services G. E. Kerr - Lab. Services D. C. A. Zale - Lab. Services D. G. S. Kramer - Fossil Fuel D. File 23-01-B-1
Laboratory Data: BTU; 18	,587	B70/16	File - Ashley Oil
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## FORM 4643 INSTRUCTIONS FOR THE COMPLETISNOF THIS FORM ARE ON A SEPARATE SHEET.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102

314-751-3241

EMERGENCY RESPOR U.S. COAST GUARD 1-800-424-3303 CHEM TREC 1-800-424-9300

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## HAZARDOUS WASTE MANIFEST

UNIFORM HAZARDOUS	Generator's LIS EPA ID No.	anifect 1 2	Page / Info	mation frithe sha	ided are
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#### RM 4643 ISTRUCTIONS FOR THE OMPLETION OF THIS FORM RE ON A SEPARATE SHEET.

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Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102
314-751-3241

EMERGENCY RESPONS U.S. CDAST GUARD 1-800-424-6802 CHEM TREC 1-800-424-9300

Form Approved OMB No 2000-0404 Expires 7-31-86

### **HAZARDOUS WASTE MANIFEST**

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St. Louis, 10 63107			
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Facility Owner or Operator: Cartification of rec	eint of hazardous materials covered by	this manifest except	he noted in
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	or included includes covered by		Date
Printed/Typed Name 1	Signature -3		Date
			Date

Job No. 430 L. S. #8688

#### REQUEST FOR ANALYSIS CENTRAL LABORATORY

M9577 10/13/86

(One Sheet per Group of Analyses)

•		Date 7/18/86
Sample No. or Identification: TRANS	FER REQU	
Description of Sample: Waste Oil Fo	eom/8286e	ATIOT ST. AND OORSETT
PUMPED INTO DAY TANK		
Analysis Desired: FLASHPOINT, To	OTAL HALDGE	ENS, ARSENIC, CADMI
CHROMIUM, LEAD		- North Company of the Company of th
	·	
Remarks: (Include special conditions wh	nich may influence	type of test)
CHARGE ACCOUNT:	. Requested	by: PAUL PIKE
Div. Major Minor Loc. Budget W.O.	Department	: ENVIRONMENTAL SERVICE
61 512 80	Copies to:	JAMES MURPHYL
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		FRANK BLOOD
		KEN CARPENTER
Laboratory Data: 20 S	0.14	FILE
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#### INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET, THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

#### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality
Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102
314-751-3241

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-124-8502
CHEM TREC
1-800-424-9300
DEPT. OF NATURAL RESOURCES

#### HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2000-0404. Expires 7-31-88 1. Generator's US EPA ID No. UNIFORM HAZARDOUS Manifest Document No. 2. Page \_ Information in the shaded areas **WASTE MANIFEST** is required by State law. 3. Generator's Name and Mailing Address A. Missouri Manifest Document Number UNION Electric IXIXI Dorsett, Rd. Maryland Heights, Mo. 63042 B. State Generator's ID + other. 1.6 5. Transporter 1 Company Name 6. US EPA ID Number C. MO. Transporter's ID INION Electric ( U. MODO 916,713,316,0) D. Transporter's Phone 1 1 1 3 2 2 7. Transporter 2 Company Name E. Mo. Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address

WNION Electric CD. AShley Blant G. State Facility's ID PR Ashley + Wharf St. H. Facility's Phone ST. Louis Mo. 63102 621-3222 . 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 12. Containers Total Quantity Combustible Other GENERATO NO. Other MO. Othei d. MO. , , , , , <sup>1</sup> Other 7 J. Additional Descriptions for Materials Listed Above \* 1 \* 1 والمحافق K. Handling Codes for Wastes Listed Above 11 ,¢[ \* . . i - t 1 š) ,, .1 A) : 2 18 15. Special Handling Instructions and Additional Information Contain and Clean Spilled 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and national government regulations and applicable state regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Printed/Typed Name Month Day 17-110 1106 17. Transporter 1 Acknowledgement of Receipt of Materials Date Printed/Typed Name Signature Day 18. Transporter 2 Acknowledgement of Receipt of Materials Date Printed/Typed Name Signature Month Day 19. Discrepancy Indication Space A 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date T Printed/Typed Name Signature Day Month EPA Form 8700-22 (Rev. 4-85) MDNR-HWG 10

15# 87039 (215%)

CHATTAL LABORATORY

(One Sheet per Group of Analyses)

		Date /-7-87
Serie To. cr Hentification: Transfer Rec	juisition No. (	6803
Description of Sample: TRANSFORMER Oil From FAI	IRVIEW HEIGH	TS Sugaration
(Three samples from each tanker compartmen	nt) Pumped into	the Day Tank at the
Analysis Desired: Total Halogens, Flash Point		
(Follow special waste oil analysis procedure	for bottle clean	ing composition and
analysis.)	· · · · · · · · · · · · · · · · · · ·	ing, compositing and
Remarks: (Include special conditions which metals analyses to be sent out to Industrial	my influence typ Testing Lab.	e of test)
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CEARGE ACCOUNT:	Requested by:	P. Pike
Div. Major Minor Loc. Budget W.O.	Department:	Environmental Services
<u>61 S12</u> 80	Copies to:	J. Murphy - Ashley
	·	F. X. Blood J. K. Carpenter
		G. E. Kerr C. A. Zale
		File 23-01-B-1 File - Ashley Oil
Laboratory Data: FLASH POINT 136 F		
PCB: 7 - MIXED DIZ		
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As: 22 ppm		
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Cr 12 "		
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#### ORM 4643 ISTRUCTIONS FOR THE OMPLETION OF THIS FORM RE ON A SEPARATE SHEET.

HIS DOCUMENT MUST BE

SED FOR ALL MISSOURI-

#### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program Jefferson City, Missouri 65102 P.O. Box 1368

314-751-3241

## HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC

ESTINED SHIPMENTS. 1-800-424-9300 ease print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No 2000-0404 Expires 7-31-86 UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manifest 2. Page Information in the shaded areas Document No **WASTE MANIFEST** MODO006.8.7.3.9.21 is not required by Federal law. 3. Generator's Name and Mailing Address A. Missouri Manifest Document Number Union Electric Company Operations Storeroom 8 P.O. Box 620 B. State Generator's ID - other 676-8668 5. Transporter 1 Company Name 6. US EPA ID Number C. MO. Transporter's ID 1 11027 Union Electric Company IM-O-D-O-9-6-7-3-3-6-0-5 D. Transporter's Phone 1 621-3222 7. Transporter 2 Company Name 8. US EPA ID Number E. MO. Transporter a ID F. Transporter's Phone | 1/2 | 9. Designated Facility Name and Site Address 10. US EPA ID Number G. State Facility's ID Ashley Plant Ashley&Wharf Sts. H. Facility's Phone 8 St. Louis, MO 63102 12.Containers 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number Total Unit Waste No Combustille Quantity Wi/Vo Waste 011, Elamoble Liquid, NOS UN1993 6.0.0.0 GAL Other . .0.1Other, MO. J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above 20. 10.50 的 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19.19 19 6. 《京都的图》,"新安徽等的是国际的工作和公司等的。" 15. Special Handling Instructions and Additional Information If spilled, contain and clean up. 16. GENERATOR'S CERTIFICATION: Thereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and applicable state regulations. Date Printed/Typed Name Signature Month Day Year ast VO 0.9163176 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name James 1 Date Signature Month Day Gregory Do Salinov 0.90.3 18. Transporter 2 Acknowledgement or Receipt of Materials Date Printed/Typed Name Signature Month Day, Year 19 Discrepancy Indication Space 20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Date Printed/Typed Name Signature Month Day Year 0.9 0.418.6

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LS# 1094

## EISTLANA NON TEATLESS

(One Sheet per Group of Analyses)

	•	,	Date 9-5-86
Samua To. or Identification:	Transfer Re	quisition No.	5069
Description of Sample: Waste			
(Three samples from each t	anker compartm	ent) Pumped int	o the Day Tank at the
Analysis Desired: Total Haloge			
(Follow special waste oil ana	lysis procedur	for bottle clea	ning composition and
analysis.)	COM	DACI	
			1 semple
Benarie: (Include special con	nditions which	may influence ty	pe of test)
Metals analyses to be sent or	ut to Industria	l Testing Lab.	
CEARGE ACCOUNT:			
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The second secon	t y.O.	Department:	Environmental Services
<u>61 512 80</u>		Copies to:	J. Murphy - Ashley F. X. Blood
	•	· ·	J. K. Carpenter
		<del></del>	G. E. Kerr C. A. Zale
	• •	<i>f</i>	File 23-01-B-1 File - Ashley Oil
Laboratory Data: Flack Por	NY = 120 F		
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Cadmiin		- 42	
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# FORM 4643 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR THE MISSOURI DESTINED SHIPMENTS.

## MISSOURI F

MISSOURI DEPARTMENT OF NATURAL RESOURCES
Division of Environmental Quality
Waste Management Program
P.O. Box 1368 Jefferson City, Missouri 65102
314-751-3241
HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE 1-800-424-8802 CHEM TREG -1-800-424-9300

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20. Facility Owner or Operator: Certification of receipt of Item 19.	hazardous materials covered by this manifest except as noted in
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# FORM 4843 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEA PATE SHEET.

THIS DOCUM HT MUST BE USED FOR ALL MISSOURI—DESTINED SHIPMENTS.

EMERGENCY RESPONSE 1) U.S. COAST GUARD 1-800-424-6802 CHEM TREC 1-800-424-9300

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# MISSOURI DEPARTMENT OF NATURAL RESOURCES Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102 314-751-3241 HAZARDOUS WASTE MANIFES

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	20. Facility Owner or Operator: Certification of Item 19.	receipt of hazardous ma	terials covered by this	manifest except as no	ted in.		S.
'						Date	THIS ITY.
	Printed/Typed Name	Signa	ature .	.e.	Month		
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LS#861487

## CENTRAL LABORATORY

(One Sheet per Group of Analyses)

			Date 12-23-86
Samis To. er Identifi	cation: Transfer Re	quisition No.,	5097
Description of Sample:	Waste Oil From D	ORSETT WAR	EHOUSE AND VENICE PLA
(Three samples fro	m each tanker compartme	ent) Pumped intent	o the Day Tank at the
			140°F), Metals (As, Cd, Cr, Pb
	oil analysis procedure		
analysis.)			g, compositing and
Remarks: (Include spe Metals analyses to be	e sent out to Industria	may influence typ	pe of test) ( Ran'd 2/2/87)
HARIR ACCOUNT:		Requested by:	P. Pike
My. Major Minor Loc	Budget W.O.	- Department:	Environmental Services
61 512	80	Copies to:	J. Murphy - Ashley F. X. Blood J. K. Carpenter
	,		G. E. Kerr C. A. Zale File 23-01-B-1
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Laboratory Data:	FLASH PT.	: >1400F	
	TOTAL HALDSEN	5: 1.64 %	
	Cp; 22 ppm		
	Cr: 7,2 ppm		
Recommendations:	Pb: 168 ppm	بالمسيد والمرابع والمستدين والمستدين والمستدين والمستدين	
	As: 42 ppm		
· ·			

#### Day Tank Weekly Inspection

Inspection Date 6/13/87 Time 400 p. MI
Inspector's Name J, HALEY
A. Visually check the following for any sign of leakage:
1. Tank Structure
2. Drain Valve $ u$
3. Suction Heater $\nu$
4. Fill Piping
B. Visually check the following for any sign of deterioration or need of repair:
1. Earth Containment Dike
2. Concrete Wall
3. Fence C
Note helew constants.

all o.K.

Signed

Forward this report to the Engineering Office when complete.

AHackment 5

## HAZARDOUS WASTE RECEIVED REPORT

Date Received 1/14/86	
Date Inspected 1/14/86	
Inspector's Name	
Accompanying Manifest Document Number 0001	
Description of Waste Material Waste oil fla	mable
legue NOS UN 1993	
Does the received waste material match the identity of designated on the accompanying manifest?	the waste
Remarks or Observations:  And Packed up at August 2,00.	at deb
Noh	leter

Job No. 1184 1/9/81

Please forward this form with accompanying manifest to the Engineering Office.

## ORM 4643 NSTRUCTION SEFOR THE COMPLESSON OF THIS FORM REON A SEPARATE SHEET.

HIS DOCUMENT MUST BE . SED FOR ALL MISSOURI— ESTINED SHIPMENTS.

(Form designed for use on elite (12-pitch) typewriter)

ease print or type.

#### MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102

314-751-3241

**EMERGENCY RESPOY** U.S. COAST GUARC 1-800-424-8802 CHEM TREC 1-800-424-9300

### HAZARDOUS WASTE MANIFEST

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FORM 4643 INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE GNA SEPARATE SHEET.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 1368 Jefferson City, Missouri 65102

.314-751-3241

EMERGENCY RESPONSE. U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

## HAZARDOUS WASTE MANIFEST

	EPA ID No.	Vanifest	2.Pa	ge I Inform	o. 2000-040	
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Union Electric Company			Α.	1.3.4	L. IM	10 . 15
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4. Generator's Phone (	: .: ·			1 A1325		
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If spilled, contain and clean up. Kee	p out of untern	ay's .			ţ	
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